

STATE OF MINNESOTA)
) ss. AFFIDAVIT OF CHAD SCHLIEPSIEK
COUNTY OF RAMSEY)

I, Chad Schliepsiek, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigations and have been employed as a federal law enforcement officer for 19 years. I have participated in numerous criminal investigations into a wide variety of federal crimes, including, but not limited to, narcotics and fugitive apprehension. I also have participated in the execution of numerous search warrants and arrest warrants. My duties include, but are not limited to, investigating violations involving Unlawful Flight to Avoid Prosecution, Custody or Confinement after Conviction.

2. This affidavit is in support of a criminal complaint charging **HUDEIFE MUHUMED MIRE** (hereinafter **MIRE**) with Unlawful Flight to Avoid Prosecution, Custody or Confinement after Conviction in violation of Title 18, United States Code, Section 1073.

3. The facts set forth in this affidavit are based upon my own personal observations, my training and experience, and information obtained during this investigation from other sources. This affidavit is intended to show that there is probable cause to obtain a criminal complaint and does not purport to set forth all my knowledge of, or investigation into, this matter.

4. On or about May 19, 2022, the Kandiyohi County Attorney's Office in Willmar, Minnesota, charged **MIRE** with Murder – 3rd Degree – Sell/Give/Distribute Controlled Substances – Schedules 1& 2, in violation of Minnesota Statutes

609.195(b). Under Minnesota state law, this is a felony offense punishable by a term of imprisonment exceeding one year. **MIRE** was also charged with one count of Manslaughter – 2nd Degree – Culpable Negligence Creating Unreasonable Risk, in violation of Minnesota Statute 609.205(1); and one count of Drugs – 1st Degree – Sale -100 grams or more other narcotic-within 90 day period, in violation of Minnesota Statute 152.021(4).

5. The May 19, 2022, charges in Kandihoyi County stem from an incident involving **MIRE** on April 16, 2022. On that date, **MIRE** did without intent to cause death, proximately cause the death of Samantha Myers by, directly or indirectly, unlawfully selling a schedule I or II controlled substance. Law enforcement officers responded to a residence in New London, MN where Myers was found unresponsive. Dispatch reported CPR was in process and Narcan was administered to the overdose victim. According to witnesses, Myers was found cold to the touch, her lips were blue, and vomit emanating from her. Myers was found in the bathroom. According to the responding law enforcement officers, based on the evidence found near Myers, the cause of death was a drug overdose. Law enforcement officers found a straw, tin foil, a lighter, and a blue pill with M30 stamped on it in the bathroom of the residence. M30 is Percocet or Oxycodone, a narcotic and schedule II controlled substance. Counterfeit M30 pills are known to contain Fentanyl. Fentanyl is a controlled II substance.

6. During the follow-up investigation, law enforcement learned from a witness, Myers had bought “dirty 30” pills from an individual nick-named JUICE,

later identified as **MIRE**. Further investigation determined Mark Rodriquez, who was living with MYERS prior to her death had stated he had given MYERS between \$50 and \$75 for her to buy two to three pills from **MIRE**. MYERS told Rodriquez she was going to buy 2-3 pills of Percocet. Rodriquez stated while he was at work, he did receive several text messages from MYERS that had purchased pills from **MIRE**. Rodriquez described how MYERS would use Percocet pills by putting them on tinfoil, lighting it, and inhaling the fumes. Rodriquez stated he had inhaled Percocet pills with MYERS in the past. Rodriquez told investigators that MYERS purchased pills from **MIRE** on April 16, 2022.

7. A search warrant was executed on **MIRE's** two cell phones. Communications between **MIRE** and MYERS was located on **MIRE's** cell phone. Further examination of MYER's cell phone found a contact named Juice. Forensic examination of the cell phones determined there was a conversation arranging a drug deal between **MIRE** and MYERS on March 24, 2022.

8. Law enforcement investigators found numerous messages between **MIRE** and MYERS involving the purchase of Percocet on April 16, 2022. Law enforcement found a cash app on MYERS's phone which detailed a \$75 payment to Juice. The payment occurred on April 16, 2022 at 5:24 pm.

9. On May 5, 2022, law enforcement went to the residence of Rodriquez who consented to a search of his cell phone. Law enforcement located messages between MYERS and Rodriquez where MYERS states "Can't wait to smoke a p with u later." Myers texted that "Juice was a jerk earlier when he came in." MYERS sent

a series of text that state Juice was the only one that has rn (meaning right now). But they are the good ones. Dark Blue. There are also text messages where MYERS texted "Can I borrow 25 baby. Please. JUICE fucked me over."

10. On May 11, 2022, law enforcement received a final summary report from Dr. Kendra Palmer, Midwest Medical Examiner's Office which indicated the toxicology studies confirmed the presence of Fentanyl and Norfentanyl.

11. On May 17, 2022 law enforcement applied for and received a search warrant for **MIRE**'s person, a 2016 Chrysler 200 with Minnesota plate BNF838, and for the address of 121 24th Street NW, Apt 302, Willmar, MN. During the execution of the warrant of **MIRE**'s residence, a small black journal labeled "JUICE'S book" was located with numerous other personal effects and residency documents belonging to **MIRE**. Inside the journal was a listing of a username and password for Bremer Bank. The username was JUICE11, and the password had the name HUDEIFE. Two safes were searched and 1362 blue pills in baggies weighing approximately 151.1 grams without packaging located.

12. According to records received from U.S. Customs and Border Protection on June 4, 2022, three days after his initial appearance, **MIRE** fled the State of Minnesota to Nairobi, Kenya, via Delta Airlines flight number 162. For this reason, **MIRE** has not been located in the State of Minnesota since being charged, has not been arrested, and is currently considered a fugitive by the State of Minnesota.

13. Your affiant has obtained and reviewed a copy of the May 19, 2022, Order of Detention and Release Order for **MIRE**. The Order Detention indicated the

following alleged violations committed by **MIRE** in Kandiyohi County, Minnesota: Murder 3rd Degree – Sell/Give/Distribute Controlled Substance Schedule 1 & 2, in violation of Minnesota Statutes 609.195(b); Manslaughter 2nd Degree – Culpable Negligence Creating Unreasonable Risk in violation of Minnesota Statute 609.205(1); Drugs 1st Degree – Sale 100 grams or more other narcotic-within 90 day period, in violation of Minnesota Statute 152.021.1(4).

14. Based on my investigation, it is believed that **MIRE** fled the United States on June 4, 2022, to return to his place of birth in Kenya. On June 4, 2022, **MIRE** departed Minneapolis, Minnesota, via Delta Flight 162 with a final destination of Kenya with no scheduled return flight. Based on all available information known to your affiant, **MIRE** remains in Kenya.

15. Your affiant has determined that **MIRE** absconded from the State of Minnesota in order to avoid prosecution under the laws of the State of Minnesota.

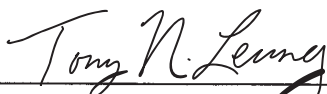
16. Based on the foregoing, your affiant believes that **MIRE** fled the State of Minnesota following his June 1, 2022 Initial Appearance for the purpose of avoiding criminal prosecution. Kandiyohi County charged **MIRE** for causing the April 16, 2022 death of MYERS. For all these reasons, your affiant believes that **MIRE** traveled in interstate and foreign commerce to avoid prosecution for previously-described felony offense, in violation of Title 18, United States Code, Section 1073 – Unlawful Flight to Avoid Prosecution, Custody, or Confinement after Conviction.

Further your Affiant sayeth not.



CHAD SCHLIEPSIEK,
Special Agent
Federal Bureau of Investigation

SUBSCRIBED and SWORN before me
by reliable electronic means (Zoom and email)
pursuant to Fed. R. Crim. P. 41(d)(3).



July 5, 2022

THE HONORABLE TONY N. LEUNG
United States Magistrate Judge

July 5, 2022